



U.S. Department
of Transportation

Research and
Special Programs
Administration

APR 13 1999

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Greg Dyben
President
Rocketflite
836 Houston Drive
New Haven, Indiana 46774.

Ref. No. 98-0268

Dear Mr. Dyben:

This is in response to your letter dated August 1, 1998, requesting clarification on the proper classification of your igniter kit for use by model rocket and high power rocket consumers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Under § 173.22, it is the shipper's responsibility to properly classify and describe a hazardous material. This Office generally does not perform this function. However, we provide assistance when we have the information available. Based on the information contained in your material safety data sheets, photos, and in your letter, your igniter kit contains two products:

Bottle A

20 grams of plastic dip (plasticizer)

10 grams of magnesium powder 190-325 mesh. (Thoroughly mixed and suspended in plastic dip/plasticizer. This plasticizer is impervious to moisture, completely preventing the magnesium from coming into contact with moisture.)

Bottle B

20 grams of potassium perchlorate

Magnesium powder is listed as a Division 4.3 dangerous when wet material in the Hazardous Materials Table (HMT) under the HMR. According to your material safety data sheet, the plasticizer is a Class 3 flammable material. If the plasticizer is a liquid, the correct hazard class may be a Class 3 flammable liquid material. However, if the plasticizer is a paste, the correct hazard class may be a Division 4.1 flammable solid material. Potassium perchlorate is listed as a Division 5.1 oxidizing material in the HMT. If your materials meet any of the hazard class defining criteria in Part 173, they are subject to the HMR.



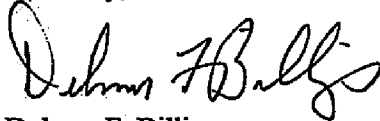
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Based on the quantities of hazardous materials described in your igniter kit, and provided all provisions are met, your product may be shipped under the small quantities exception in § 173.4 of the HMR. In order to ship as a consumer commodity, materials must meet the limited quantity provisions for that hazard class in Part 173 and the definition of a consumer commodity in § 171.8.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in dark ink, appearing to read "Delmer F. Billings". The signature is fluid and cursive, with the first name "Delmer" and last name "Billings" clearly distinguishable.

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards